

EXHIBIT A

**IN THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF VIRGINIA
Alexandria Division**

UNITED STATES, *et al.*,

Plaintiffs,

v.

GOOGLE LLC,

Defendant.

Case No. 1:23-cv-00108-LMB-JFA

**DECLARATION OF AARON ROSS IN SUPPORT OF AMAZON.COM, INC.'S
SPECIFIC OBJECTIONS TO PUBLIC DISCLOSURE AT TRIAL OF CERTAIN
DOCUMENTS, DATA, AND DEPOSITION DESIGNATIONS**

I, Aaron Ross, pursuant to 28 U.S.C. § 1746, hereby declare as follows:

1. I am in-house counsel at Amazon. My title is Corporate Counsel.
2. I submit this declaration in support of Amazon's Specific Objections to Public Disclosure at Trial of Certain Documents, Data, and Deposition Designations ("Objections").
3. The contents of this declaration are based on my personal knowledge of Amazon's business practices and the information and documents relevant to competitive decision-making within Amazon's marketing business. If called as a witness in this action, I could and would testify competently as to the contents of this declaration.
4. I understand that the parties in this case have included in exhibit lists and deposition designations certain information and data that Amazon produced in this case and designated Confidential or Highly Confidential under the applicable protective orders. Further, I understand that this Court has permitted any party or non-party opposing the public disclosure of this confidential information to file a specific objection with a proposed acceptable redaction of the

information. Amazon has requested copies of the documents at issue, but the parties have not provided all of them or unredacted versions of all of them, explaining that some of them contain other parties' and third parties' confidential information as well. Accordingly, I describe the documents and Amazon's information contained within them to the best of my ability based on the information that the parties have provided.

5. The materials described below contain Amazon's confidential and competitively sensitive information, the disclosure of which would work severe harm to Amazon's marketing business and the competitive landscape. Specifically, Amazon respectfully requests that the Court maintain the following materials under seal:

- **Google's Exhibit List:**

- **AMZNADTECH-AGG-LIT-00000003.001** (data extracted from Amazon's database systems, the redaction of which is not feasible). This is voluminous raw data concerning Amazon's revenue, fees, impressions, clicks, and additional data. Public disclosure would cause irreparable harm to Amazon's competitive position. Public disclosure would enable Google, other ad publishers, and other competitors to unfairly leverage that non-public information in negotiations with or competition against Amazon and/or Amazon's customers, resulting in severe harm to Amazon and to the competitive landscape.
- **AMZNDOJ0247645** (data extracted from Amazon's database systems, the redaction of which is not feasible). This is raw data concerning Amazon's impressions and revenue across different platforms and services. Public disclosure would cause irreparable harm to Amazon's competitive position. Public disclosure would enable Google, other ad publishers, and other competitors to unfairly leverage that non-public information in negotiations with or competition against Amazon, resulting in severe harm to Amazon and to the competitive landscape.
- **AMZNDOJ0000207** (business planning document). Describing Amazon's Ads Benchmarking process and related strategy, including its partnerships with other brand advertisers. This is a detailed, lengthy, single-spaced document filled with sensitive business information. Amazon has requested additional information regarding the specific portions that will be used at trial, so that Amazon can focus on reaching an agreement with Google regarding the necessary redactions, if any. Amazon has not yet received this information, and therefore respectfully requests the opportunity to

continue to meet and confer with Google regarding this document. Public disclosure would enable Google, other ad publishers, and other competitors to unfairly leverage that non-public information in negotiations with or competition against Amazon. It would also enable Google, other ad publishers, and other competitors to interfere with the strategy of Amazon and other brand advertisers, causing severe harm to the competitive landscape.

- **AMZNDOJ0000225** (business planning document). Comparing Amazon self-service advertising services with competitor services, focusing on advertising campaign structure, optimizations, targeting, and identifying gaps in the service. This is a detailed, lengthy, single-spaced document filled with sensitive business information. Amazon has requested additional information regarding the specific portions that will be used at trial, so that Amazon can focus on reaching an agreement with Google regarding the necessary redactions, if any. Amazon has not yet received this information, and therefore respectfully requests the opportunity to continue to meet and confer with Google regarding this document. Public disclosure would permit Google, other ad publishers, and other competitors to interfere with Amazon strategy regarding self-service advertising. Public disclosure would also disrupt the self-service advertising market by enabling competitors in that market to exploit Amazon's strategy and analysis regarding other self-service advertising services.
- **AMZNDOJ0001265** (filing with a foreign regulator). Discussing a wide variety of topics, including Amazon's strategy of developing its digital advertising business; details on how Amazon uses data to develop and maintain the search functionality of its platform; how Amazon uses data to target digital advertising to specific audiences; and Amazon's use of real-time bidding to auction its ad inventory. This is a detailed, lengthy, single-spaced document filled with sensitive business information. Amazon has requested additional information regarding the specific portions that will be used at trial, so that Amazon can focus on reaching an agreement with Google regarding the necessary redactions, if any. Amazon has not yet received this information, and therefore respectfully requests the opportunity to continue to meet and confer with Google regarding this document. Public disclosure would permit Google, other ad publishers, and other competitors to leverage non-public information to compete against Amazon for the advertising market for small businesses, resulting in severe harm to Amazon and to the competitive landscape.
- **AMZNDOJ0023642** (business email). Describing conversations held between Amazon account managers and other ad publishers, including the strategic thoughts of those ad publishers and how Amazon could best meet their business needs. This is a detailed, lengthy, single-spaced document filled with sensitive business information. Amazon has requested additional information regarding the specific portions that will be used at trial, so that

Amazon can focus on reaching an agreement with Google regarding the necessary redactions, if any. Amazon has not yet received this information, and therefore respectfully requests the opportunity to continue to meet and confer with Google regarding this document. Public disclosure would permit Google, other ad publishers, and other competitors to interfere with Amazon's strategy, as well as the strategy of the 19 other ad publishers mentioned within. Public disclosure would enable competitors to undercut Amazon in negotiations with these ad publishers, resulting in severe harm to Amazon and to the competitive landscape.

- **AMZNDJ0066388; AMZNDJ0066394** (business planning documents). Discussing Amazon's efforts to improve performance and delivery of Multi-Channel advertising campaigns through the development of models, products, and programs, as well as the modeling and engineering of key advertising metrics like "winrate" and bid shading. These are detailed, lengthy, single-spaced documents filled with sensitive business information. Amazon has requested additional information regarding the specific portions that will be used at trial, so that Amazon can focus on reaching an agreement with Google regarding the necessary redactions, if any. Amazon has not yet received this information, and therefore respectfully requests the opportunity to continue to meet and confer with Google regarding these documents. Public disclosure would enable Google, other ad publishers, and other competitors to unfairly leverage non-public information in negotiations with Amazon in relation to Amazon's Multi-Channel advertising strategy, resulting in severe harm to Amazon and to the competitive landscape. Amazon is not seeking to seal the email to which this document is attached.
- **AMZNDJ0090735** (business planning document). Discussing Amazon's plans for Transparent Ad Marketplace for Small Business. This is a detailed, lengthy, single-spaced document filled with sensitive business information. Amazon has requested additional information regarding the specific portions that will be used at trial, so that Amazon can focus on reaching an agreement with Google regarding the necessary redactions, if any. Amazon has not yet received this information, and therefore respectfully requests the opportunity to continue to meet and confer with Google regarding this document. Public disclosure would permit Google, other ad publishers, and other competitors to leverage non-public information to compete against Amazon for the advertising market for small businesses, resulting in severe harm to Amazon and to the competitive landscape. Amazon is not seeking to seal the email to which this document is attached.
- **AMZNDJ0105660; AMZNDJ0105666** (business planning documents). Describing Amazon's strategies for addressing the needs of advertisers in the automotive industry, including customers' spend on Amazon's advertising products and their advertising strategies. These are

detailed, lengthy, single-spaced documents filled with sensitive business information. Amazon has requested additional information regarding the specific portions that will be used at trial, so that Amazon can focus on reaching an agreement with Google regarding the necessary redactions, if any. Amazon has not yet received this information, and therefore respectfully requests the opportunity to continue to meet and confer with Google regarding these documents. Public disclosure would enable Google, other ad publishers, and other competitors to unfairly leverage that non-public information in negotiations with or competition against Amazon, and interfere with those customers' strategies, resulting in severe harm to Amazon and to the competitive landscape. Amazon is not seeking to seal the email to which this document is attached.

- **AMZNDOJ0107882; AMZNDOJ0107883** (business email with attachment). Discussing highly confidential Amazon programs and strategy related to bid optimization. Amazon has included with this filing a redacted version of AMZNDOJ0107882. *See* Exhibit B. AMZNDOJ0107883 is a detailed, lengthy, single-spaced document filled with sensitive business information. Amazon has requested additional information regarding the specific portions that will be used at trial, so that Amazon can focus on reaching an agreement with Google regarding the necessary redactions, if any. Amazon has not yet received this information, and therefore respectfully requests the opportunity to continue to meet and confer with Google regarding this document. Public disclosure would enable competitors to copy or imitate Amazon's proprietary technology and interfere with Amazon's planned products and business strategy, resulting in severe harm to the competitive landscape.
- **AMZNDOJ0132443; AMZNDOJ0132446; AMZNDOJ0132448; AMZNDOJ0132454; AMZNDOJ0132455; AMZNDOJ0132463** (customer assessment documents). Describing Amazon's strategies for influencing potential customers, including customers' spend on Amazon's advertising products and their advertising strategies. Amazon has included with this filing redacted versions of these documents. *See* Exhibits C, D, E, F, G, and H. Public disclosure would enable Google, other ad publishers, and other competitors to unfairly leverage that non-public information in negotiations with or competition against Amazon, and interfere with those customers' strategies, resulting in unfair competitive harm to Amazon and to the competitive landscape. Amazon is not seeking to seal the email to which this document is attached.
- **AMZNDOJ0159229** (business email). Discussing the advertising business's goals and challenges, including discussions regarding responding to developments with Amazon's competitors and business partners. Amazon has included with this filing a redacted version of this document. *See* Exhibit I. Public disclosure would enable Amazon's competitors to interfere with Amazon's marketing strategy by using that

information to extract concessions from Amazon.

- **AMZNDOJ0185951** (business planning document). Discussing Amazon's advertising infrastructure planning, including metrics related to advertising supply, as well as related risks and opportunities. Amazon has included with this filing a redacted version of this document. *See* Exhibit J. Public disclosure would enable Google, other ad publishers, and other competitors to unfairly leverage that non-public information in negotiations with or competition against Amazon, resulting in severe harm to Amazon and to the competitive landscape. Amazon is not seeking to seal the email to which this document is attached.
- **AMZNADTECH-LIT-000000023** (business planning document). Describing strategy regarding Amazon Publisher Services as it relates to competitors like Google and other third-party ad exchanges, including Amazon's acquisition efforts. This is a detailed, lengthy, single-spaced document filled with sensitive business information. Amazon has requested additional information regarding the specific portions that will be used at trial, so that Amazon can focus on reaching an agreement with Google regarding the necessary redactions, if any. Amazon has not yet received this information, and therefore respectfully requests the opportunity to continue to meet and confer with Google regarding this document. Public disclosure would enable competitors to anticipate and undercut Amazon's positions, resulting in unfair competitive harm to Amazon and to the competitive landscape.
- **DTX 1839**, Israel Report Figure 18: Google Ads and DV360 Share of U.S. Indirect Open Web Display (Non-Video) Advertiser Buying Tool Spending, 2019-2022. Describing Amazon's share of buying tool indirect web non-video ad spending. Amazon is unaware of the exact nature of the Amazon data included in this figure because it was provided with a redacted version. Amazon seeks only to redact the portion of this figure displaying Amazon's data. Public disclosure would enable Amazon's competitors to leverage non-public information to strategically bid against Amazon in competitive bidding situations.
- **DTX 1862**, Israel Report Figure 41: AdX Share of U.S. indirect Open Web Display (Non-Video) Exchange Spending, 2019-2022. Describing Amazon's share of exchange indirect web non-video gross revenue. Amazon is unaware of the exact nature of the Amazon data included in this figure because it was provided with a redacted version. Amazon seeks only to redact the portion of this figure displaying Amazon's data. Public disclosure would enable Amazon's competitors to leverage non-public information to strategically bid against Amazon in competitive bidding situations.
- **DTX 1891**, Israel Report Figure 74: Advertiser Buying Tool Average Fees,

2020-2022. Describing Amazon's average fee for advertiser buying tools. Amazon is unaware of the exact nature of the Amazon data included in this figure because it was provided with a redacted version. Amazon seeks only to redact the portion of this figure displaying Amazon's data. Public disclosure would enable Amazon's competitors to leverage non-public information to strategically bid against Amazon in competitive bidding situations.

- **DTX 1892**, Israel Report Figure 75: Ad Exchange Average Fees, 2020-2022. Describing Amazon's average fee for using its ad exchange. Amazon is unaware of the exact nature of the Amazon data included in this figure because it was provided with a redacted version. Amazon seeks only to redact the portion of this figure displaying Amazon's data. Public disclosure would enable Amazon's competitors to leverage non-public information to strategically bid against Amazon in competitive bidding situations.
- **DTX 1893**, Israel Report Figure 76: Combined Advertiser Buying Tool and Exchange Fees, 2020-2022. Describing Amazon's approximate average buying tool and exchange fees. Amazon is unaware of the exact nature of the Amazon data included in this figure because it was provided with a redacted version. Amazon seeks only to redact the portion of this figure displaying Amazon's data. Public disclosure would enable Amazon's competitors to leverage non-public information to strategically bid against Amazon in competitive bidding situations.
- **DTX 1943**, Israel Report Figure 130: Google Ads and DV360 Combined Share of U.S. Indirect Open Web Display (Non-Video) Advertiser Buying Tool Spending, 2019-2022. Describing Amazon's share of buying tool indirect web non-video ad spending. Amazon is unaware of the exact nature of the Amazon data included in this figure because it was provided with a redacted version. Amazon seeks only to redact the portion of this figure displaying Amazon's data. Public disclosure would enable Amazon's competitors to leverage non-public information to strategically bid against Amazon in competitive bidding situations.
- **DTX 1948**, Israel Report Figure 135: Shares Among Advertiser Buying Tools for All U.S. Display Advertising, 2022. Describing Amazon's share of the U.S. display advertising buying tool market. Amazon is unaware of the exact nature of the Amazon data included in this figure because it was provided with a redacted version. Amazon seeks only to redact the portion of this figure displaying Amazon's data. Public disclosure would enable Amazon's competitors to leverage non-public information to strategically bid against Amazon in competitive bidding situations.
- **DTX 1949**, Israel Report Figure 136: Shares Among Ad Exchanges for All U.S. Display Advertising, 2022. Describing Amazon's share of the U.S.

display advertising ad exchange market. Amazon is unaware of the exact nature of the Amazon data included in this figure because it was provided with a redacted version. Amazon seeks only to redact the portion of this figure displaying Amazon's data. Public disclosure would enable Amazon's competitors to leverage non-public information to strategically bid against Amazon in competitive bidding situations.

- **DTX 1950**, Israel Report Figure 137: Shares Among Publisher Ad Servers for All U.S. Display Advertising, 2022. Describing Amazon's share of the U.S. display advertising publisher ad servers market. Amazon is unaware of the exact nature of the Amazon data included in this figure because it was provided with a redacted version. Amazon seeks only to redact the portion of this figure displaying Amazon's data. Public disclosure would enable Amazon's competitors to leverage non-public information to strategically bid against Amazon in competitive bidding situations.
- **DTX 1955**, Israel Report Figure 142: Selected Non-Google Advertiser Buying Tool U.S. Indirect Open Web Display (Non-Video) Spending, 2019-2022. Describing Amazon's indirect web non-video display ad spending. Amazon is unaware of the exact nature of the Amazon data included in this figure because it was provided with a redacted version. Amazon seeks only to redact the portion of this figure displaying Amazon's data. Public disclosure would enable Amazon's competitors to leverage non-public information to strategically bid against Amazon in competitive bidding situations.
- **DTX 1956**, Israel Report Figure 143: Selected Non-Google Ad Exchanges U.S. Indirect Open Web Display (Non-Video) Spending, 2019-2022. Describing Amazon's indirect web non-video display gross revenue. Amazon is unaware of the exact nature of the Amazon data included in this figure because it was provided with a redacted version. Amazon seeks only to redact the portion of this figure displaying Amazon's data. Public disclosure would enable Amazon's competitors to leverage non-public information to strategically bid against Amazon in competitive bidding situations.
- **DTX 1988**, Israel Report Table 21: U.S. Indirect Open Web Display (Non-Video) Advertiser Buying Tool Spending Shares, 2019-2022. Describing Amazon's share of the U.S. indirect open web display (non-video) advertising buying tool spending. Amazon is unaware of the nature of the data included in this figure because it was provided with a heavily redacted version. To the extent the data included would enable Google or other competitors to reverse engineer the data that was provided by Amazon, Amazon seeks to redact the portion of this figure displaying Amazon's data. Public disclosure would enable Amazon's competitors to leverage non-public information to strategically bid against Amazon in competitive bidding situations.

- **DTX 1991**, Israel Report Table 24: Shares Among Advertiser Buying Tools, Ad Exchanges, and Publisher Ad Servers for All U.S. Display Advertising, 2022. Describing Amazon's share of advertising buying tools, ad exchanges, and publisher ad servers for all U.S. display advertising. Amazon is unaware of the nature of the data included in this figure because it was provided with a heavily redacted version. To the extent the data included would enable Google or other competitors to reverse engineer the data that was provided by Amazon, Amazon seeks to redact the portion of this figure displaying Amazon's data. Public disclosure would enable Amazon's competitors to leverage non-public information to strategically bid against Amazon in competitive bidding situations.
- **DTX 2049**, Chevalier Report Appendix Exhibit 9: AD BUYING TOOLEXCHANGE COMBINATIONS AVERAGE FULL-STACK REVENUE SHARE ADX SELL-SIDE, XBRIDGE BUY-SIDE & THIRD-PARTY DATA | WORLDWIDE TRANSACTIONS JANUARY 2019 - MARCH 2023. Describing Amazon's worldwide ad buying tool average revenue share. Amazon is unaware of the nature of the data included in this figure because it was provided with a heavily redacted version. To the extent the data included would enable Google or other competitors to reverse engineer the data that was provided by Amazon, Amazon seeks to redact the portion of this figure displaying Amazon's data. Public disclosure would enable Amazon's competitors to leverage non-public information to strategically bid against Amazon in competitive bidding situations.
- **DTX 2050**, Chevalier Report Appendix Exhibit 10: AD BUYING TOOL ANNUAL GROSS REVENUE, TOTAL FEES, AND AVERAGE REVENUE SHARE XBRIDGE BUY-SIDE DATA & THIRD-PARTY DATA | WORLDWIDE TRANSACTIONS JANUARY 2016 – MARCH 2023. Discussing Amazon's worldwide ad buying tool gross revenue, total fees, and average revenue share. Amazon is unaware of the nature of the data included in this figure because it was provided with a heavily redacted version. To the extent the data included would enable Google or other competitors to reverse engineer the data that was provided by Amazon, Amazon seeks to redact the portion of this figure displaying Amazon's data. Public disclosure would enable Amazon's competitors to leverage non-public information to strategically bid against Amazon in competitive bidding situations.
- **DTX 2052**, Chevalier Report Exhibit 7: AD BUYING TOOL ANNUAL GROSS REVENUE, TOTAL FEES, AND AVERAGE REVENUE SHARE XBRIDGE BUY-SIDE DATA & THIRD-PARTY DATA | U.S. TRANSACTIONS JANUARY 2016 – MARCH 2023. Describing Amazon's U.S. ad buying tool annual gross revenue, total fees, and average revenue share. Amazon is unaware of the nature of the data included in this figure because it was provided with a heavily redacted version. To the

extent the data included would enable Google or other competitors to reverse engineer the data that was provided by Amazon, Amazon seeks to redact the portion of this figure displaying Amazon's data. Public disclosure would enable Amazon's competitors to leverage non-public information to strategically bid against Amazon in competitive bidding situations.

- **DTX 2062**, Chevalier Report Figure 6: U.S. Average Monthly Revenue Share by Ad Buying Tool (Jan. 2016 – Mar. 2023). Describing Amazon's U.S. average monthly revenue share by ad buying tool. Amazon is unaware of the exact nature of the Amazon data included in this figure because it was provided with a redacted version. Amazon seeks only to redact the portion of this figure displaying Amazon's data. Public disclosure would enable Amazon's competitors to leverage non-public information to strategically bid against Amazon in competitive bidding situations.
- **DTX 2063**, Chevalier Report Figure 7: U.S. Annual Average Revenue Share for DV360 and Competing Ad Buying Tools (Jan. 2016 - Mar. 2023). Describing Amazon's U.S. annual average revenue share for ad buying tools. Amazon is unaware of the nature of the data included in this figure because it was provided with a heavily redacted version. To the extent the data included would enable Google or other competitors to reverse engineer the data that was provided by Amazon, Amazon seeks to redact the portion of this figure displaying Amazon's data. Public disclosure would enable Amazon's competitors to leverage non-public information to strategically bid against Amazon in competitive bidding situations.
- **DTX 2064**, Chevalier Report Figure 8: U.S. Average Full-Stack Revenue Share by Ad Buying Tool – Exchange Combinations (Jan. 2019 – Mar. 2023). Describing Amazon's U.S. average revenue share for ad buying tools. Amazon is unaware of the nature of the data included in this figure because it was provided with a heavily redacted version. To the extent the data included would enable Google or other competitors to reverse engineer the data that was provided by Amazon, Amazon seeks to redact the portion of this figure displaying Amazon's data. Public disclosure would enable Amazon's competitors to leverage non-public information to strategically bid against Amazon in competitive bidding situations.
- **DTX 2071**, Chevalier Report Figure 15: U.S. Comparison of Google Full-Stack Revenue Shares to Competitors Full-Stack Revenue Shares (Jan. 2019 – Mar. 2023). Describing Amazon's U.S. revenue shares. Amazon seeks only to redact the portion of this figure displaying Amazon's data. Amazon is unaware of the nature of the data included in this figure because it was provided with a heavily redacted version. To the extent the data included would enable Google or other competitors to reverse engineer the data that was provided by Amazon, Amazon seeks to redact the portion of this figure displaying Amazon's data. Public disclosure would enable

Amazon's competitors to leverage non-public information to strategically bid against Amazon in competitive bidding situations.

- **DOJ's Exhibit List:**

- **AMZNDOJ0106814** (business planning document). Describing Amazon's investment in Google's ad exchange, including metrics regarding spend growth and spend projections across web, video, and mobile app platforms. Public disclosure would enable competitors to undercut Amazon in negotiations with Google and other ad publishers, resulting in severe harm to Amazon and to the competitive landscape. Amazon is not seeking to seal the email to which this document is attached.
- **AMZNDOJ0120918** (business opportunity assessment). Discussing opportunities and strategies for Amazon's Transparent Ad Marketplace. Public disclosure would enable Google, other ad publishers, and other competitors to unfairly leverage that non-public information in negotiations with or competition against Amazon, resulting in severe harm to Amazon and to the competitive landscape. Amazon is not seeking to seal the email to which this document is attached.
- **Figure 69, Rebuttal Expert Report of Robin Lee: Google Ads maintained a substantial share of US indirect open-web display impressions among all advertiser bidding tools (2018–2022).** Reflecting Amazon's highly confidential data regarding U.S. indirect open-web display impressions from 2018–22. Amazon seeks only to redact the portion of this figure displaying Amazon's data. Public disclosure would enable Google and other competitors to unfairly leverage Amazon's non-public information in negotiations with Amazon, resulting in severe harm to Amazon and to the competitive landscape.
- **Figure 70, Rebuttal Expert Report of Robin Lee: Google and third-party bidding tools' shares of US indirect open-web impressions (2022).** Reflecting Amazon's highly confidential data regarding U.S. indirect open-web display impressions from 2018–22. Amazon seeks only to redact the portion of this figure displaying Amazon's data. Public disclosure would enable Google and other competitors to unfairly leverage Amazon's non-public information in negotiations with Amazon, resulting in severe harm to Amazon and to the competitive landscape.
- **Figure 71, Rebuttal Expert Report of Robin Lee: Google Ads maintained a substantial share of worldwide indirect open-web display spending among all advertiser bidding tools (2018–2022).** Reflecting Amazon's highly confidential data regarding worldwide indirect open-web display impressions from 2018–22. Amazon seeks only to redact the portion of this figure displaying Amazon's data. Public disclosure would enable Google and other competitors to unfairly leverage non-public information

in negotiations with Amazon, resulting in severe harm to Amazon and to the competitive landscape.

- **Figure 72, Rebuttal Expert Report of Robin Lee: Google Ads maintained a substantial share of US indirect open-web display spending among all advertiser bidding tools (2018–2022).** Reflecting Amazon’s highly confidential data regarding U.S. indirect open-web display impressions from 2018–22. Amazon seeks only to redact the portion of this figure displaying Amazon’s data. Public disclosure would enable Google and other competitors to unfairly leverage non-public information in negotiations with Amazon, resulting in severe harm to Amazon and to the competitive landscape.
- **DOJ’s Deposition Designations:**
 - **Deposition of Tim Craycroft, Tr. 84:3–25.** Discussing sensitive business negotiations between Amazon and Google, and Amazon’s non-public proprietary advertising technology. Public disclosure would cause competitive harm to Amazon by impacting its negotiating position with Google and other ad publishers.
 - **Deposition of Tim Craycroft, Tr. 85:2–16.** Discussing sensitive business negotiations between Amazon and Google, and Amazon’s non-public proprietary advertising technology. Public disclosure would cause competitive harm to Amazon by impacting its negotiating position with Google and other ad publishers.
 - **Deposition of Tim Craycroft, Tr. 85:18 to 86:10.** Discussing sensitive business negotiations between Amazon and Google, and Amazon’s non-public proprietary advertising technology. Public disclosure would cause competitive harm to Amazon by impacting its negotiating position with Google and other ad publishers.

6. To my knowledge, the information in the documents and deposition testimony set out above is not available to the public. Amazon’s marketing and advertising businesses take steps to protect the information as confidential, including by investing in state-of-the-art software and hardware systems that provide for only authorized access to the information.

7. If the information listed above were to be publicly disclosed, Amazon’s competitors could misuse it, such as by designing bids to undercut Amazon’s prices, unfairly leveraging non-public information in negotiations with Amazon, or gaining insight into future Amazon products or

service offerings. These unauthorized uses of Amazon's information would work severe harm to Amazon and to the competitive landscape.

8. I declare under penalty of perjury under the laws of the United States that the foregoing is true and correct.

Executed July 26, 2024 in Seattle, Washington.

/s/ Aaron Ross
Aaron Ross

EXHIBIT B

From: Mehta, Paaras [/O=AMAZON/OU=EXCHANGE ADMINISTRATIVE GROUP (FYDIBOHF23SPDLT)/CN=RECIPIENTS/CN=PAARASF3E]
Sent: 1/11/2019 3:02:07 PM
To: Leeder, Ken [REDACTED]; Siegler, Scott [REDACTED]; Adapala, Vijay [REDACTED]; Picciafuoco, Veronica [REDACTED]; Kelath, Sunil [REDACTED]
Subject: Insights from MLO doc.
Attachments: ML Optimization on the Amazon Ad Platform[2].docx
Flag: Follow Up

Spent some time reading attached MLO optimization doc (courtesy of Veronica). It provides comprehensive overview of how various bidding algorithms work, how they interact, and what signals drive their decisioning – very useful info from advertiser performance standpoint, which arms us with good discussion points for later this month.

[REDACTED]

[REDACTED]

This paragraph summarizes purpose of each component used by CS for bidding:

[REDACTED]

Its good bedtime reading – have a nice weekend!

EXHIBIT C

Executive Meeting Briefing Document

AND AMAZON MEDIA GROUP CANNES MEETING

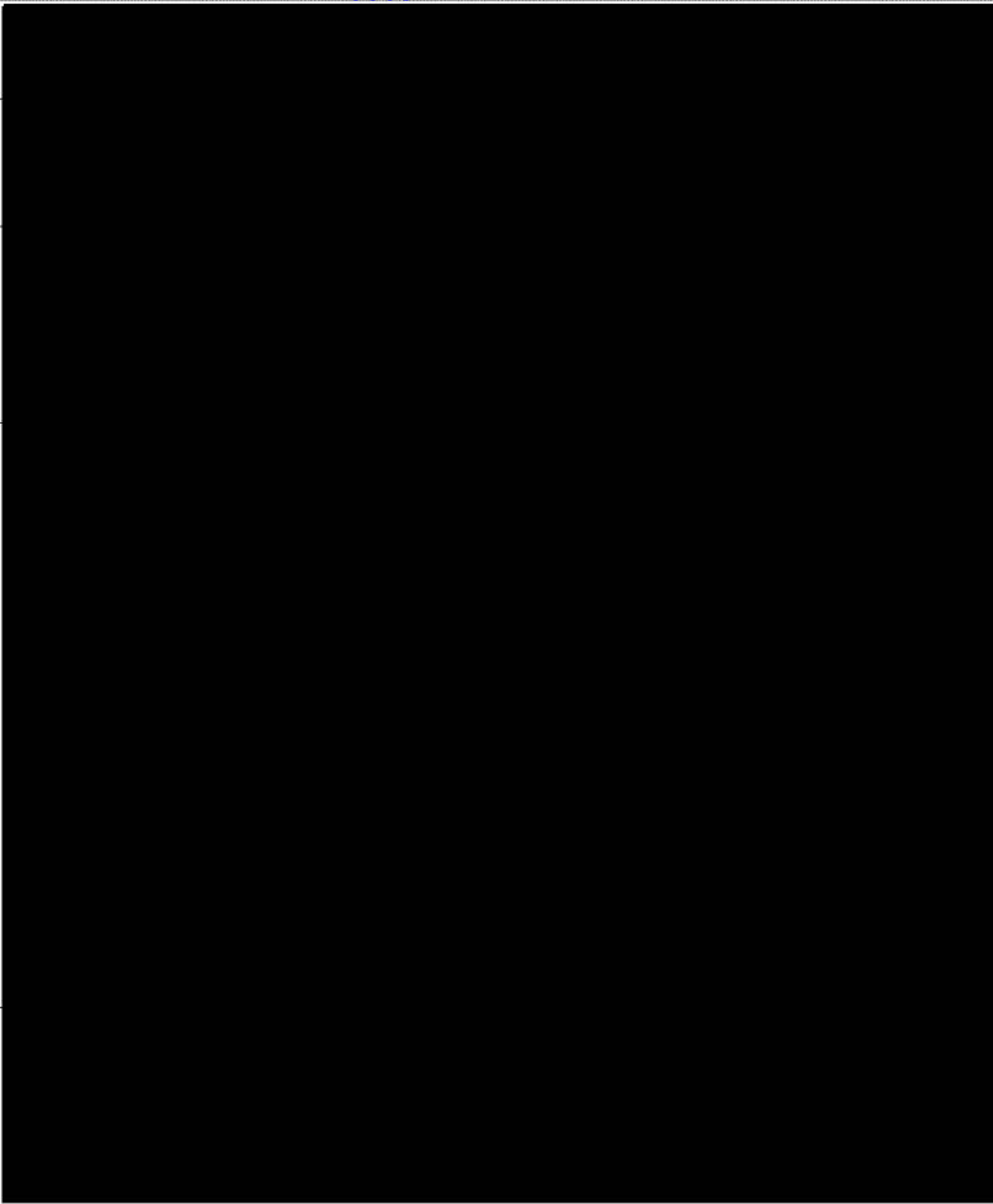
Prepared by: [REDACTED] Account Executive, Amazon Media Group
Last update: [REDACTED]


LOGISTICS

Meeting Date:	June 21, 2016	Meeting Time:	8-9a breakfast	Length of Meeting:	1 hour
Main Contact:	[REDACTED]	Phone:	[REDACTED]	Email:	[REDACTED]
		Mobile:	[REDACTED]		
Meeting Location:	Cannes Meeting Room 1				

OBJECTIVES & AGENDA

Meeting Objective	

	
<i>Client's Meeting Objective</i>	
<i>Meeting Agenda</i>	
<i>Current Hot Topics</i>	
<i>Amazon Exec's Role</i>	

Agenda	Amazon Speaker (Owner)
	





CLIENT BACKGROUND

***Background –
Client overview***

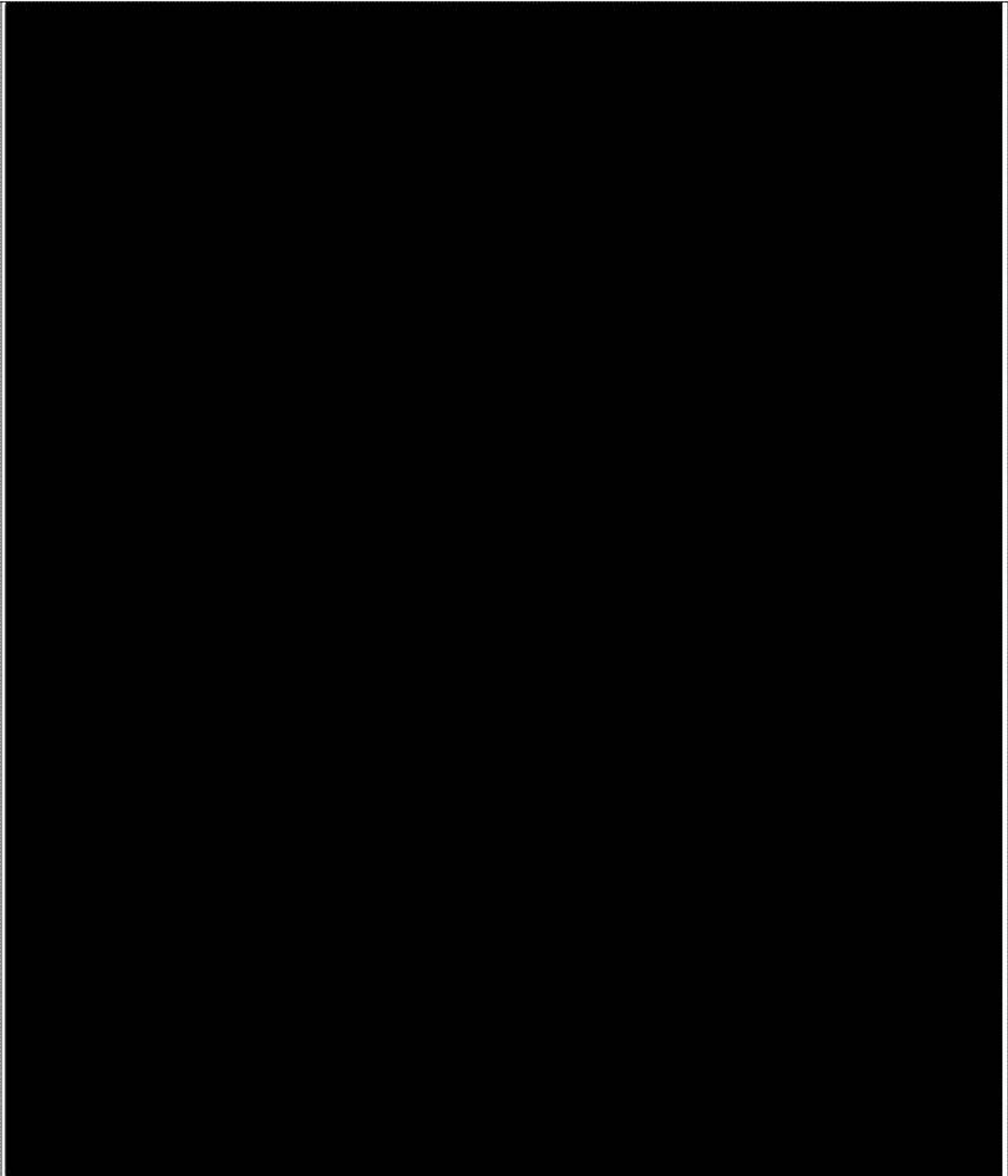


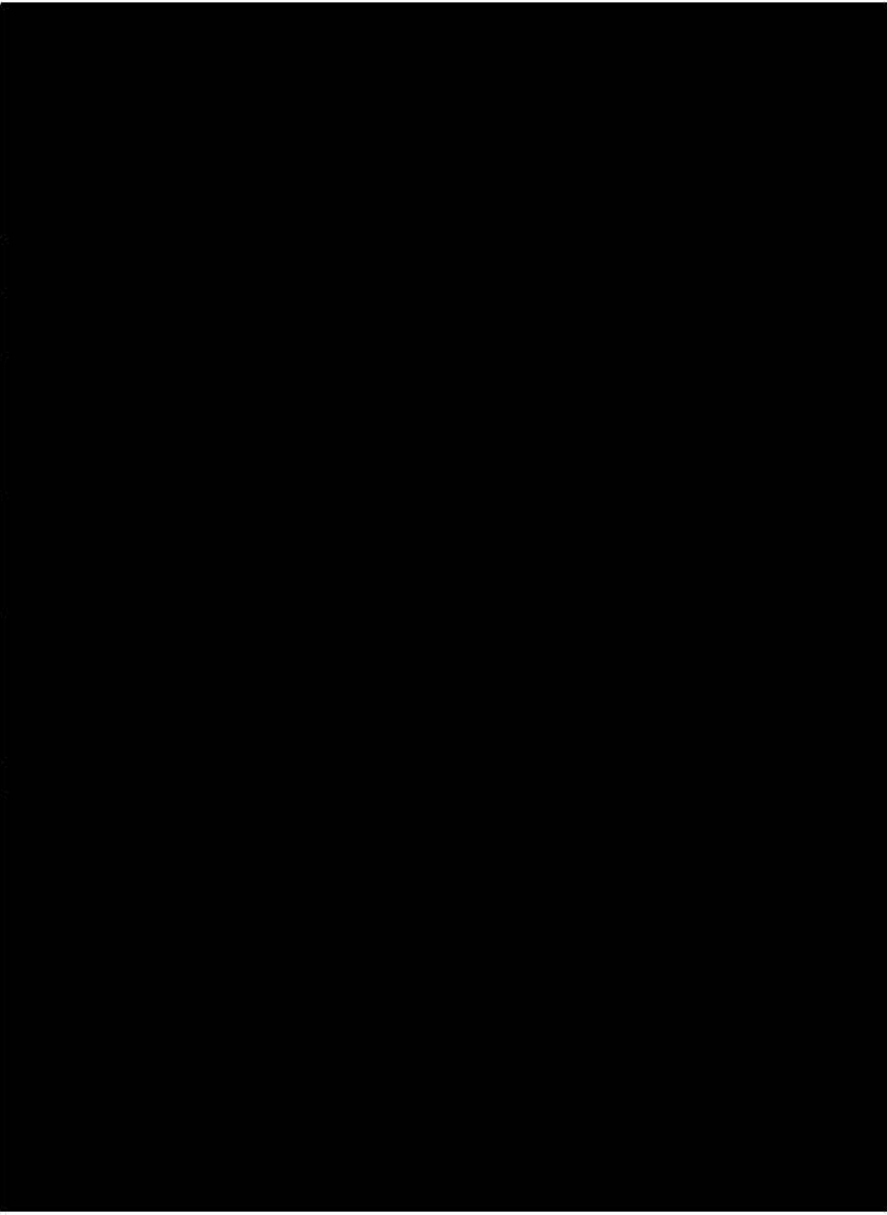
EXHIBIT D

Executive Meeting Briefing Document

██████████ Cannes meeting

Prepared by: ██████████

Last update: June 16th 2016

██████████	
Mtg Date/Time/Location	Cannes Friday 24 th June, 10:30 – 12pm Cannes Meeting Room 2, Intercontinental Carlton Cannes Hotel
Mtg Objective for AMZN	
Mtg Objective for Client	
Mtg Agenda	
Client Attendees	
AMZN Attendees	
Current Hot Topics	
Seth's Push	
Background – Client overview	

Background – Ad Revenue	
Background – Retail	

EXHIBIT E

Executive Meeting Briefing Document

[REDACTED] & AMG 2016 PARTNERSHIP MEETING

Prepared by: [REDACTED] Account Executive

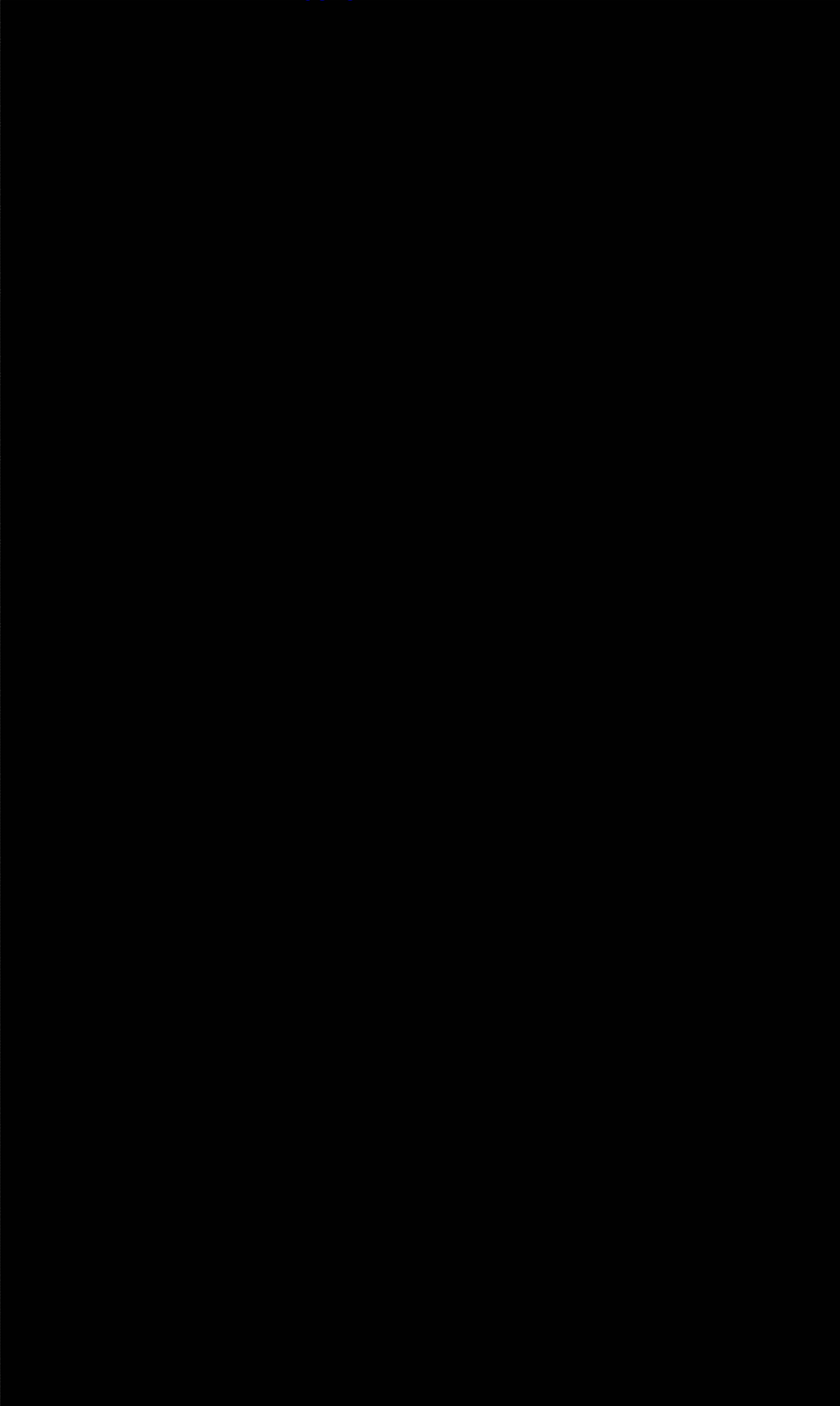
Last update:

LOGISTICS

Meeting Date:	June 22, 2016	Meeting Time:	3:30-4:30	Length of Meeting:	1 hour
Main Contact:		Phone:		Email:	
		Mobile:			
Meeting Location:	Cannes Meeting Room 1				

OBJECTIVES & AGENDA

Amazon's Meeting Objective	[REDACTED]
Client's Meeting Objective	

	
Meeting Agenda	
Current Hot Topics	

Executive Meeting Briefing Document [- 2 -]



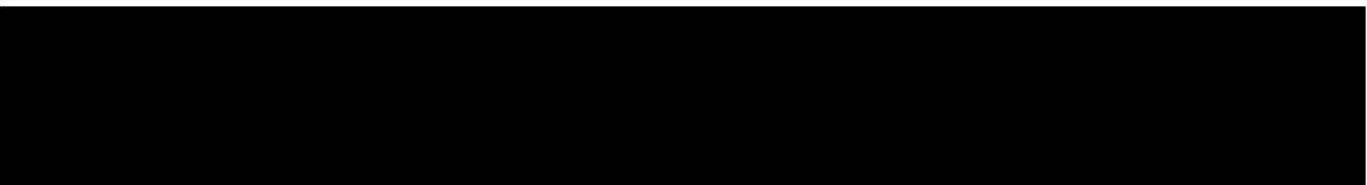
Executive Meeting Briefing Document [- 3 -]



Executive Meeting Briefing Document [- 4 -]

AMG Exec's Role	
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Agenda	AMG Speaker (Owner)



CLIENT BACKGROUND

Background – Client overview	
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Background – Other Markets	

Ad Sales: *complete table for each brand and market, if applicable*

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Retail Sales: *complete table for each brand and market, if applicable*

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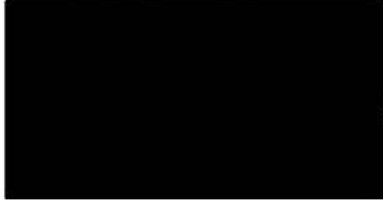
EXHIBIT F

End of Campaign Report

Campaign at a Glance:



Campaign Metrics:



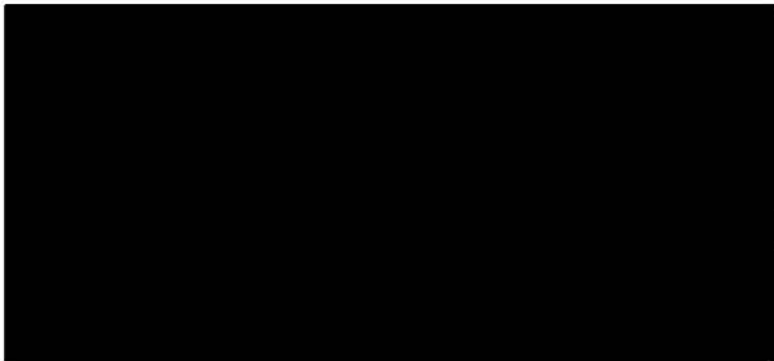
Top Targeted Audiences:



Creative Execution:



Learnings and Implications:



Campaign Breakdown:

Platform Performance



Placement Performance



ROAS = return on ad spend
*Metrics do not reflect full 14-day attribution window; report compiled prior per client request

amazon advertising

EXHIBIT G

Prepared by: [REDACTED] Snr. Account Executive
Last update: [REDACTED]

LOGISTICS

Meeting Date:	June 24 th , 2016	Meeting Time:	9-1030a	Length of Meeting:	1 hour
Main Contact:	[REDACTED]	Phone:	[REDACTED]	Email:	[REDACTED]
		Mobile:			
Meeting Location:	Cannes Meeting Room 1				

OBJECTIVES & AGENDA

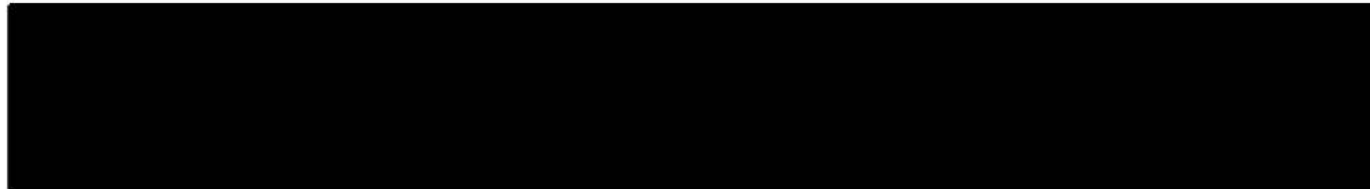
Amazon's Meeting Objective	
Client's Meeting Objective	

Meeting Agenda	

Current Hot Topics	

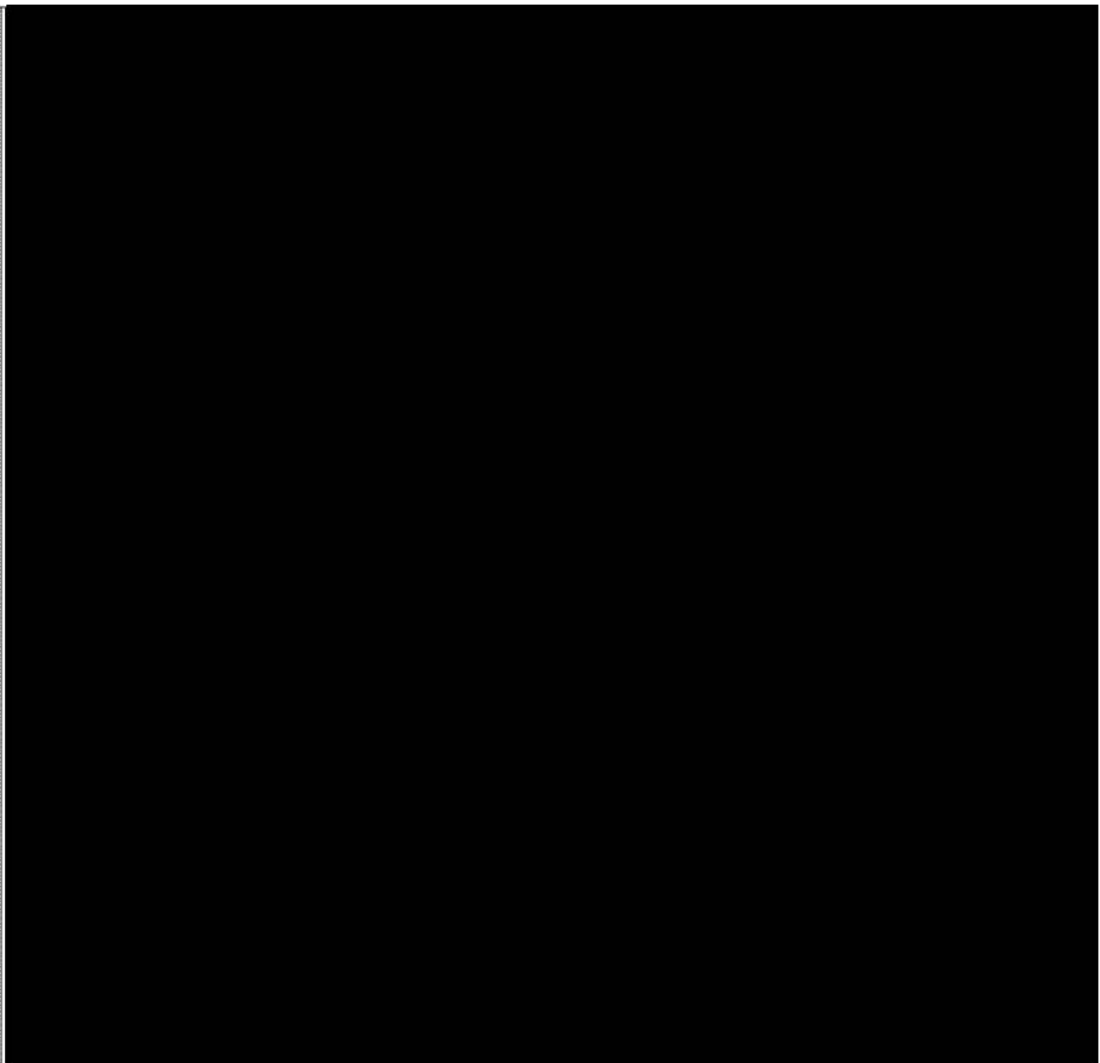
AMG Exec's Role	

Agenda	AMG Speaker (Owner)



CLIENT BACKGROUND

**Background –
Client overview**



Background – Other Markets	

Ad Sales: *complete table for each brand and market, if applicable*

--

Retail Sales: *complete table for each brand and market, if applicable*

--

Executive Meeting Briefing Document [- 6 -]



Dear Todd,


In partnership with AOL and the ARF, Oracle Data Cloud invites you to join us for breakfast and thought leadership at our "Data by the Beach" Roundtable discussion.

Some of the best ads you see across any channel, and the ones most likely to win Cannes Lions, are relevant, timely and tap into the emotion of the audience. To do this we need to balance context, insights and the production process for advertising. Hear from industry leaders who have a stake in this transformation and can work together to make advertising online the kind of advertising that can dominate Cannes for years to come.

The panel includes:

- ? Tim Mahlman, President, Platforms **AOL**
- ? Mike McCue, CEO, **Flipboard**
- ? Tom Phillips, CEO, **Dstillery**
- ? Ann Simonds, Chief Marketing Officer, **General Mills**
- ? Michael Yapp, Chief Creative Officer, Americas, **Google**

Register Today

 **When:**
June 21, 2016
9:00 AM – 10:30 AM

**Breakfast served*



Where:
Oracle Data Cloud Live Tent
Located at the base of the

Executive Meeting Briefing Document [- 7 -]

*Welcome and introductions by Gayle Fuguitt
CEO, Advertising Research Foundation

Palais des Festivals et des
Congrès

*Moderated by Cory Treffiletti, Vice President of Marketing and Partner Solutions,
Oracle Data Cloud

Register by June 15th to reserve your spot.

Oracle is committed to promoting a corporate culture that is centered on integrity, accountability and ethical business conduct, please click [here](#) for important ethics information regarding this event.

Integrated Cloud
Applications & Platform Services

ORACLE

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EXHIBIT H

Executive Meeting Briefing Document

[REDACTED] & US MEDIA TEAM 2016 PARTNERSHIP MEETING

Prepared by: [REDACTED] Account Executive

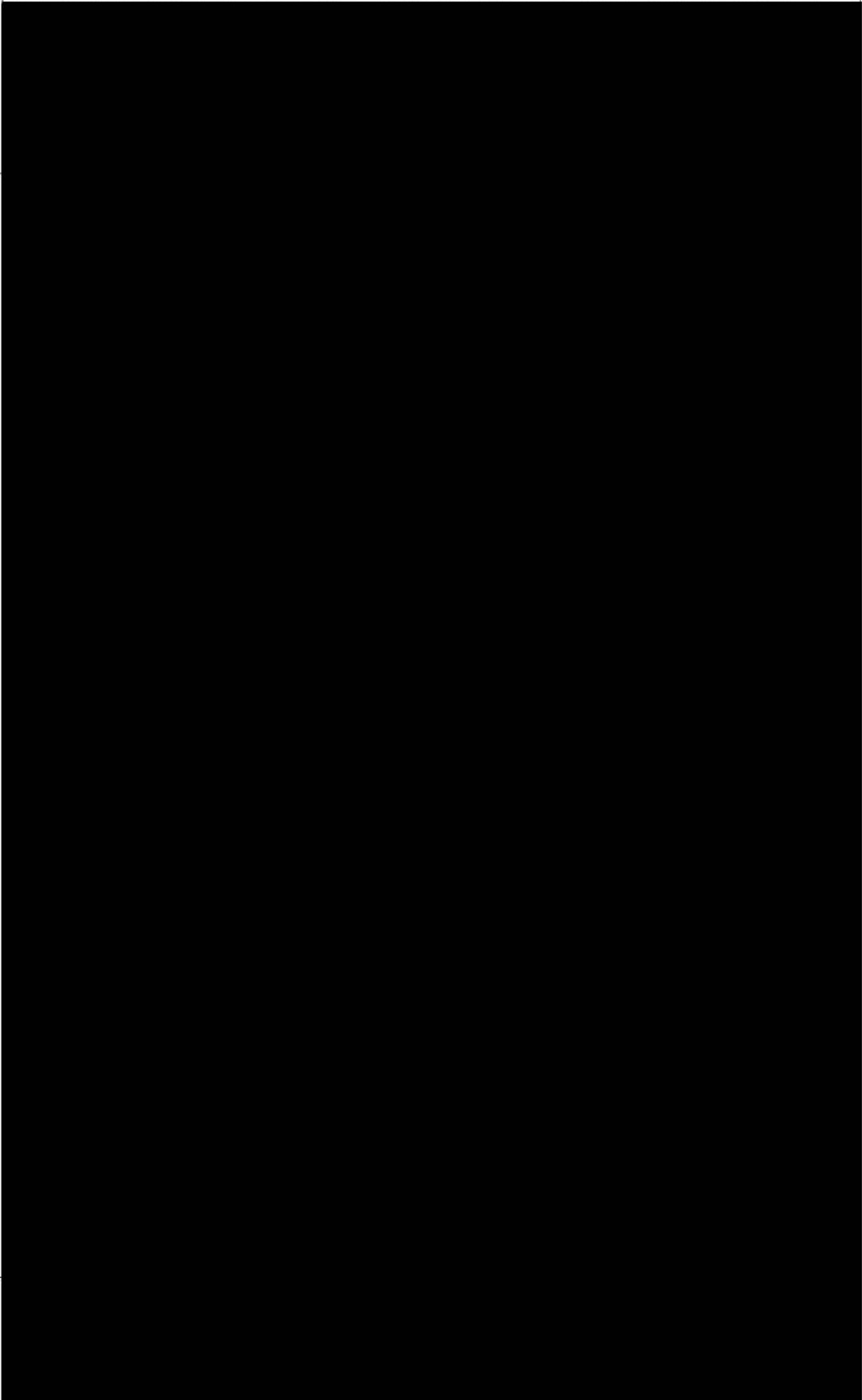
Last update:

LOGISTICS

Meeting Date:	June 23, 2016	Meeting Time:	10-11a	Length of Meeting:	1 hour
Main Contact:		Phone:		Email:	
		Mobile:			
Meeting Location:	Cannes Meeting Room 2				

OBJECTIVES & AGENDA

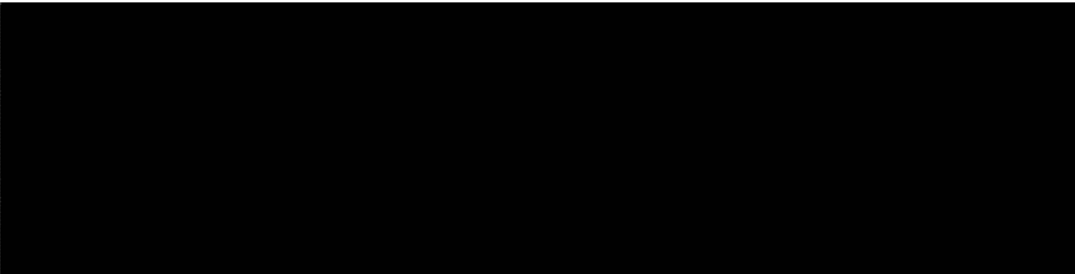
Amazon's Meeting Objective	[REDACTED]
Client's Meeting Objective	[REDACTED]

Meeting Agenda	
Current Hot Topics	
AMG Exec's Role	

--	--



CLIENT BACKGROUND

Background – Client overview	
Background – Other Markets	

Ad Sales: *complete table for each brand and market, if applicable*



EXHIBIT I

From: Battles, Matthew [/O=AMAZON/OU=EXCHANGE ADMINISTRATIVE GROUP (FYDIBOHF23SPDLT)/CN=RECIPIENTS/CN=BATTLES]
Sent: 12/8/2017 4:20:20 PM
To: Musku, Anil [REDACTED]
CC: Leeder, Ken [REDACTED]; Craycroft, Tim [REDACTED]
Subject: Re: APS-3PPD Update - November 2017

[REDACTED]

Sent from my iPhone

On Dec 8, 2017, at 1:34 PM, Musku, Anil [REDACTED] wrote:

+aps-3ppd@, so the team can see this feedback

responses inline.

From: "Battles, Matthew" [REDACTED]
Date: Thursday, December 7, 2017 at 9:16 PM
To: "Musku, Anil" [REDACTED]
Cc: "Craycroft, Tim" <[REDACTED]>, "Leeder, Ken" [REDACTED], "Gladney, Stephanie" [REDACTED], "Prabhu, Girish" [REDACTED], "Bitoun, Lionel" <[REDACTED]>, "Hall, Matthew" [REDACTED]
Subject: Re: APS-3PPD Update - November 2017

-most recipients

Great progress and lots of interesting developments, Anil.

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

Matt

Sent from my iPhone

On Dec 7, 2017, at 3:18 PM, Musku, Anil <[REDACTED]> wrote:

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

<image002.png>

EXHIBIT J

OP2 2020 Advertising Infrastructure Planning (IMR @ 2019 Rate Card) 79602

	Team	Fleet Owner	2019 Actual	2020 OP2 (planned)	YoY variance (\$)	YoY variance (%)	2020 OP1	OP2 vs. OP1 var (\$)	var (%)
1 A9 - Advertising Analytics		Girish							
2 A9 - Ad Exchange Platform		Girish							
3 A9 - Supply Quality		Ashwin							
4 A9 - Publisher Display Products		Ken							
5 A9 - IFS		Iya							
6 APS-Video-Advertising		Girish							
7 A9 - ConX		Ashwin							
8 A9 - Advertising Science		Girish							
9 Associates Ad Units		Ashwin							
10 A9 - Ad Tech Operations									
11 A9 - Ad Tech DB									
12 Ad Tech									
13 Other									
14 Supply Total									
15 Placements		Carl							
16 Vivid (Video Demand)		Ide							
17 A9 - RobotDetection Clicks		Ashwin							
18 Battles Total									

19 Advertising Supply - 2019 to 2020 (2019 Rates, in \$MM)

		IMR	YoY
21 2019 IMR	\$		
22			
23 Organic growth (plug to tie out fleet totals)			
24 A9 - Advertising Analytics	\$		
25 A9 - Ad Exchange Platform	\$		
26 A9 - Supply Quality	\$		
27 A9 - Publisher Display Products	\$		
28 A9 - IFS	\$		
29 APS-Video-Advertising	\$		
30 A9 - ConX	\$		
31 A9 - Advertising Science	\$		
32 Other	\$		
33			
34 Organic Growth Total	\$		
35			
36			
37			
38			
39			
40 EMR Migration			
41 Steady State costs: Dec20 Public EC2 annualized, a			
42			
43 A9 - Advertising Analytics	\$		
44 A9 - Advertising Analytics	\$		
45 A9 - Supply Quality	\$		
46 A9 - IFS	\$		
47 A9 - Publisher Display Products	\$		
48 EMR Migration - Steady State	\$		
49			
50 Transition costs - De-annualizing Dec20 EMR migra			
51 A9 - Advertising Analytics	\$		
52 A9 - Advertising Analytics	\$		
53 A9 - Supply Quality	\$		
54 A9 - IFS	\$		
55 A9 - Publisher Display Products	\$		
56 EMR Migration - Transition	\$		
57			
58 EMR Migration - Total	\$		
59			
60			
61 KDF Migration to NAWS			
62 A9 - Ad Exchange Platform	\$		
63 A9 - Ad Exchange Platform	\$		
64			
65 KDF Migration Total	\$		
66			
67 New Initiatives			
68 A9 - Ad Exchange Platform	\$		
69 A9 - Supply Quality	\$		
70 APS-Video-Advertising	\$		
71 A9 - IFS	\$		
72 A9 - Advertising Science	\$		
73			
74 New Initiatives	\$		
75			
76			
77 2020 total incremental IMR	\$		
78 2020 IMR	\$		

79 Graycroft Go-Get	\$	
80 2020 IMR net of Go-Get	\$	

81 Risks

82 A9 - Advertising Analytics	
83 A9 - Ad Exchange Platform	
84 A9 - Supply Quality	
85 A9 - Publisher Display Products	
86 A9 - IFS	

87 Opportunities

88 A9 - Advertising Analytics	
89 A9 - Ad Exchange Platform	
90 A9 - Supply Quality	
91 A9 - Publisher Display Products	
92 A9 - IFS	

OP2 2020 Advertising Infrastructure Planning (IMR @ 2020 Rate Card)

	Team	Fleet Owner	2019 Expected	2020 OP2 (planned)	YoY variance (\$)	YoY variance (%)	2020 OP1	OP2 vs. OP1 var (\$)	var (%)
1	A9 - Advertising Analytics	Girish							
2	A9 - Ad Exchange Platform	Girish							
3	A9 - Supply Quality	Ashwin							
4	A9 - Publisher Display Products	Ken							
5	A9 - IFS	Ilya							
6	APS-Video-Advertising	Girish							
7	A9 - ContX	Ashwin							
8	A9 - Advertising Science	Girish							
9	Associates Ad Units	Ashwin							
10	A9 - Ad Tech Operations								
11	A9 - Ad Tech DB								
12	Ad Tech								
13	Other								
14	Supply Total								
15	Placements	Carl							
16	Vivid (Video Demand)	Joe							
17	A9 - RobotDetection Clicks	Ashwin							
18	Battles Total								